

ORIGINAL

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Attorney for Plaintiff
John (Jack) Angello

FILED
Clerk
District Court

DEC 13 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

JOHN (JACK) ANGELLO,
Plaintiff,

v.

NORTHERN MARIANAS COLLEGE,
Defendant.

CIVIL ACTION NO. 03-0014

**PLAINTIFF'S'S PROPOSED VOIR
DIRE QUESTIONS**

COMES NOW Plaintiff, John (Jack) Angello, by and through counsel of record, Danilo T. Aguilar, to propose the following questions to be asked of prospective jurors in this action during the jury selection to be held December 27, 2005.

1. Are you related to Dr. Jack Angello by either blood or marriage?
2. Are you related to any current NMC employees, including President Tony DL. Guerrero, Jack Sablan, Kimberly Hinds, other NMC Board members by either blood or

1 marriage?

2
3 3. Are you related to any of the persons who may be
4 witnesses in this case? _____

5 4. Do you personally know Dr. Angello?

6 5. Can you explain the circumstances of how you know Dr.
7 Angello, and the length of time that you've known him?

8 6. Do you personally know any NMC employees?

9 7. Can you explain the circumstances of how you know any of
10 the NMC staff, and the length of time that you've known
11 them?

12 8. Will your relationship with either Dr. Angello or any of
13 the NMC employees favor one over the other(s), or make
14 you believe one over the other(s)?

15 9. Do you attend NMC now or have you attended in the past,
16 and when?

17 10. Do you have any relative or friend who works at NMC?

18 11. If you have any relative or friend who works at NMC,
19 what is their name and what position do they have?

20 12. Have you, or a friend or family member, ever been a
21 victim of sexual harassment or retaliation on the job?


22 13. If so, can you explain the circumstances?

23 14. Would this knowledge of sexual harassment or retaliation
24 cause you to feel strongly for or against Dr. Angello,
25 in that you could not consider the evidence with an open
mind and decide the case solely on the facts presented
to you and the law given to you by the Court?

- 1 15. Do you feel that a woman or a man should not be required
2 to tolerate sexual harassment or retaliation by a co-
3 worker or supervisor at his or her jobsite?
4
- 5 16. Do you feel that a person who files a claim of sexual
6 harassment or discrimination should be retaliated
7 against or terminated?
8
- 9 17. Do you have any views or opinions regarding laws
10 prohibiting sexual harassment or retaliation, that is,
11 whether they are necessary or unnecessary in our
12 society?
13
- 14 18. Are you familiar with Dr. Angello's educational and
15 administrative background? If so, please explain.
16
- 17 19. Are you familiar with the policies and laws governing
18 the Northern Mariana College? If so, please explain.
19
- 20 20. Are you familiar with NMC's Vocational Programs and do
21 you think that they are necessary or unnecessary? If
22 so, please explain.
23
- 24 21. Do you know Mr. Matthew Smith, NMC's attorney? If so,
25 please explain the circumstances of this relationship.
22. Have you heard anything about Mr. Smith in the event
that you do not personally know him? If so, please
explain.
23. Are you having medical treatment or on medication at
this time that could impair your being a jury member in
this case?
24. Is there anything else that you want to add that may

1 affect your membership of this jury?
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3

4 Dated this 13th day of December, 2005.
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9 DANILO T. AGUILAR
10 Attorney for Plaintiff
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